

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DEBORAH CHIN, Individually And On Behalf Of All
Others Similarly Situated,

Plaintiff,

VS.

SONUS NETWORKS, INC., HASSAN AHMED, and
STEPHEN NILL,

Defendants.

: Case No.: 1:04cv10294-DPW

• RELATED CASES:

1:04-cv-10307-DPW

1:04-cv-10308-DPW

1:04-cv-10310-DPW

1:04-cv-10329-DPW

1:04-cv-10333-DPW

1:04-cv-10345-DPW

1:04-cv-10346-DPW

1:04-cv-10359-DPW

1:04-cv-10362-DPW

1:04-cv-10363-DPW

1:04-cv-10364-DPW

1:04-cv-10382-DPW

1:04-cv-10383-DPW

1:04-cv-10384-DPW

1:04-cv-10454-DPW

1:04-cv-10576-DPW

1:04-cv-10597-DPW

1:04-cv-10612-DPW

1:04-cv-10623-DPW

RICHARD CURTIS, Individually And On Behalf Of
All Others Similarly Situated,

Plaintiff,

VS.

SONUS NETWORKS, INC., HASSAN M. AHMED
and STEPHEN J. NILL,

Defendants.

Case No.: 1:04cv10314-MLW

**DECLARATION OF NANCY F. GANS IN SUPPORT OF THE MOTION OF THE JIANG
GROUP FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF
AND FOR APPROVAL OF ITS SELECTION OF LEAD COUNSEL
AND LIAISON COUNSEL**

I, Nancy F. Gans, under penalties of perjury, hereby declare:

1. I am a member of the firm Moulton & Gans P.C. I make this declaration in support of the motion of the Jiang Group for consolidation, to be appointed Lead Plaintiff and for approval of its selection of Lead Counsel and Liaison Counsel.

2. Attached hereto as Exhibit A is a true and accurate copy of the notice which plaintiff in Chin v. Sonus Networks, Inc., et al., No. 04 CV 10294 (D. Mass. filed on Feb. 12, 2004) caused to be published over PR Newswire on February 12, 2004.

3. Attached hereto as Exhibit B is a true and accurate copy of the certifications of Tian Jiang, Joseph Rodulavic, and Gary Brost (collectively known as “the Jiang Group” or “Movants”).

4. Attached hereto as Exhibit C is a chart analyzing the Jiang Group’s financial interest in this litigation.

5. Attached hereto as Exhibit D is the firm resume of Milberg Weiss Bershad Hynes & Lerach LLP.

6. Attached hereto as Exhibit E is the firm resume of Moulton & Gans P.C.

Dated: April 12, 2004
Boston, Massachusetts

/s/Nancy Freeman Gans

Nancy Freeman Gans